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10 Attorneys for Defendant

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 WILLIAM O'DONOHUE, JANE FISHER &  
14 LORRAINE BENUTO

15 Plaintiffs,

16 v.

17 STATE OF NEVADA EX REL. BOARD OF  
18 REGENTS OF THE NEVADA SYSTEM OF  
19 HIGHER EDUCATION, ON BEHALF OF  
20 THE UNIVERSITY OF NEVADA RENO,

21 Defendants.

**Case No. 3:25-cv-00014-MMD-CLB**

**NOTICE OF PLAINTIFF LORRAINE  
BENUTO'S ACCEPTANCE OF OFFER  
OF JUDGMENT PURSUANT TO FRCP 68**

22 Defendant Board of Regents of the Nevada System of Higher Education on behalf of the  
23 University of Nevada, Reno ("UNR") hereby files Plaintiff Lorraine Benuto's April 24, 2025  
24 Notice of Acceptance of UNR's April 11, 2025 Offer of Judgment pursuant to FRCP 68(a), which  
25 are attached as **Exhibits 1 and 2** respectively. The Parties have complied with Items 1 through 3 of  
26 the Offer of Judgment. UNR notes that the Offer of Judgment explicitly provides that it "is not an  
27 admission of liability by UNR, but rather is made solely for the purpose of compromising a  
28 disputed claim."

1 DATED this 5th day of May, 2025.

2  
3 /s/ Frank Z. LaForge

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the University of Nevada, Reno, over the age of eighteen years, that I am not a party to the within action, and that on the 5<sup>th</sup> day of May, 2025, I electronically filed the attached OFFER OF JUDGMENT (Exhibit 1) and ACCEPTANCE OF OFFER OF JUDGMENT (Exhibit 2) with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or by U.S. mail, postage prepaid, addressed as follows:

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/s/ Pamela L. Stanley  
Employee of the University of Nevada, Reno  
of the Nevada System of Higher Education

O'Donohue, et al. v. State of Nevada Ex. Rel. Board of Regents of the Nevada System of Higher  
Education on behalf of the University of Nevada Reno  
3:25-CV-00014-MMD-CLB

**INDEX TO EXHIBITS**

1. Offer of Judgment dated April 11, 2025
2. Acceptance of Offer of Judgment dated April 24, 2025